

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

POST OFFICE STRUCTURE PLAN

DOCKET NO. N2012-2

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL
SERVICE [DBP/USPS-26 THROUGH 30]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

June 28, 2012

Respectfully submitted,

N20122E26

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-26

Please refer to your response to Interrogatory DBP/USPS-16.

Your response appears to indicate that all service complaints must be filed with the 1-800-ASK-USPS telephone system.

[a] Are customers permitted to make their complaint or inquiry directly to the local facility?

[b] Are customers permitted to make their complaint or inquiry up the USPS "chain of command"?

[c] Are customers permitted to make their complaint or inquiry directly to the Postal Regulatory Commission?

[d] Are customers permitted to make their complaint or inquiry to a non-USPS individual or entity?

[e] If the response to any or all of subparts [a] through [d] is not an unqualified yes, please respond to the original interrogatory.

DBP/USPS-27 Please refer to your response to Interrogatory DBP/USPS-18.

Please confirm, or explain if you are unable to confirm, that the Postal Service has not implemented any procedure where carriers from one independent post office have been transferred to another independent post office and/or where the supervision of one independent post office has been transferred to another independent office where both independent offices are EAS Level 18 or above.

DBP/USPS-28 Please refer to your response to Interrogatory DBP/USPS-22 subpart [b].

Please provide details on the “other solutions” that are being considered for implementation.

DBP/USPS-29 Please refer to your response to Interrogatories DBP/USPS-19 , 20, 21, and 24.

[a] Please confirm or explain that these added duties may be required to be performed at the RMPO/PTPO location.

[b] Please confirm or explain that these added duties may be required to be performed by an individual other than the “normally” assigned RMPO/PTPO employee.

[c] Please confirm or explain that there may be travel time for the APO employee to travel to the RMPO/PTPO location.

[d] Will that employee be “on the clock” while travelling from the APO to the RMPO/PTPO location?

[e] Please explain why the Postal Service cannot increase the retail time to allow for all of the necessary functions?

DBP/USPS-30

Please refer to your response to Interrogatory DBP/USPS-

17.

Please confirm, or explain if you are unable to confirm, that the Postal Service is unable to provide any rational reason that a knowledgeable survey respondent could believe it would be the best choice to have an office close and not provide any service in a given area as opposed to having some level of service available.